

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

2006 JUN -9 A 9:24

Richard Wayne Wright, Sr., \*

Plaintiff, Pro-Se., \*

-vs-

Sylvester Nettles, et. al., \*

Defendants. \*

Civil Action No.

2:05-CV-439-A-WO

DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

Plaintiff Wright Motion To Submit Other  
Evidence And/Or Exhibits On 7 June 2006.

I am Richard Wayne Wright, Sr., Plaintiff Pro-se., Submitted these Facts to this Honorable Court in the Form of this motion With Supporting documents. Plaintiff Wright was never placed in protective Custody at Bullock Correctional Facility (B.C.F.), nor was plaintiff placed in a single Cell For that purpose. Many request slips were written and given to on duty seg. OFFicers (OFFicer M. Foster, OFFicer H. Ruffen, etc.) by plaintiff and went unanswered whether [the] request slip was sent to (Warden Holt and/or Warden Boyd). (See, Exhibit 'labeled at bottom' as Exhibits One (1), two (2) and three (3), Segregation Unit Record Sheet -- two (2) sided Forms).

Dr. Jenkins States I have not been given any psychotropic medication (as noted on the said document)

but if Mr. Jenkins had taken any considerable amount of time to properly review plaintiff file (he) would have discovered that plaintiff was given psychotropic medication in 2002 and 2003 also, (see Exhibit 'labeled at top' Exhibit Four (4) psychiatric progress notes; and Exhibit Five (5) Interdisciplinary progress notes).

Defendants and/or defendants agents) have made written insertion in plaintiff prison file, which states the reason for my negative behavior is due to the lack of me not obtaining a high school diploma. This is untrue, plaintiff graduated from high school and attended one year of college at a technical college - data processing. plaintiff successfully completed an eight (8) year contract with the Alabama National Guard unit, skill's in light wheel mechanic and infantry. What's really odd about this form is the writer makes these written assertion in the blocks 'labeled' problems one (1), problem two (2) and problem three (3), then in the block 'labeled' comments the writer states the direct opposite to those written statements. (see, Exhibit 'labeled at top' Exhibit Six (6) Alabama Department of

Corrections<sup>R.W.W.</sup> (A.D.O.C.) Mental Health Services (M.H.S.) Treatment plan).

On document labeled, Exhibit Seven (7) "as labeled at the top of the page" the writer writes "Overreaction of hostility ... And ... exchange of words and accused of hitting an inmate", but they failed to completely state the injuries plaintiff received as a result of the inmate's aggressive approach and attack upon plaintiff which resulted in a physical confrontation, in which, plaintiff was forced to defend himself until other inmates separated us and the officers came. (See Exhibits Seven (7) (A.D.O.C.) (M.H.S.) treatment plan Form and Exhibit (8) (A.D.O.C.) (M.H.S.) treatment plan / Form (review)).

Plaintiff over and over again are plagued<sup>R.W.W.</sup> with negative reports which leads any reader(s) to believe these written incidents / issues are stated as facts. These are (too) the reports (believe to be) sent to the parole Board members, in plaintiff's Wright institutional file. (See, Exhibit nine (9) (A.D.O.C.) (M.H.S.) treatment plan / Form (review))

Upon such meetings / interview, labeled / dated 5/31/05, on Exhibit ten (10), Plaintiff Wright sought help from

mental Health personnel Concerning Lt. Dowling using the T.B. testing procedures to place a disciplinary infraction on plaintiff. Plaintiff Wright is unable to interpret mental health Codes (See Exhibit Ten (10). Interdisciplinary progress notes).

Plaintiff Can not distinguish and/or interpret the Codes used by mental health personnel and needs the assistance of a trained mental health professional that are willing to give plaintiff understanding. See Section dated 3/26/04 and 11/08/04, which state's plaintiff admits to something like anger OSI OHI and the next two (2) Following lines. Plaintiff does understand Section dated 6/21/04, which the writer states mental health Code is history. But when some malicious motives is intended by defendants and/or defendant's agent(s) such Codes are reinforced especially when a favorable condition and opportunity exist and is affordable to plaintiff Wright is in a lateral transfer, transfer to a lesser restricted prison, minimum out squad, etc.) Where in, plaintiff can exercise some liberty in the terms of prison. (See Exhibit <sup>Review</sup> ~~10~~ Eleven (11))

Interdisciplinary Progress notes)  
Done this the 7<sup>th</sup> day of  
June, 2006.

Respectfully Submitted,  
Richard W. Wright, Jr.  
Richard Wayne Wright, Sr. #187140  
Ventress Correctional Facility  
Segregation Unit / Cell #801  
Post Office Box 767  
Clayton, Alabama 36016

Certificate of Service

This is to Certify that I Richard Wayne Wright, Sr. Pro-Se., am the petitioner in the above encaptioned motion and Certify I have sent a copy of this motion to the Clerk of this Court and earnestly ask due to plaintiff indigent status that this Honorable Court and/or Clerk Forward a copy of this said motion to defendant's Counsel(s) which addresses are as following

Gregory F. Yayhmar  
ASB 2411-H67G  
Scott, Sullivan, Streetman & Fox, P.C.  
2450 Valley Dale Road

Birmingham, Alabama 35244

Troy King (Attorney General)  
State Bar # ASB-5949-S 615  
Steven Mallette Sirmon  
(Assistant Attorney General)  
Hugh Davis (Attorney)  
Alabama Board Pardon and Paroles  
Post Office Box 302405  
Montgomery, Alabama, 36130

David B. Block (ASB-5098-K 62D)  
William R Lunsford (ASB-4265-L 72L)  
Douglas B. Hargett (ASB-9928-S 81H)  
Balch & Birgham LLP  
Post Office Box 18668  
Huntsville, Alabama 35804-8668

Kim, T. Thomas  
Gregory Marion Biggs  
Alabama Department of Corrections  
Legal Division  
301 Ripley Street  
Montgomery, Alabama 36130

by placing this motion in the hands  
of the on duty ~~inmate~~<sup>B.W.W.</sup> officer  
to placed this in the United States  
Mail Box located here at Ventress  
Correctional Facility (V.C.F.)

With postage pre paid and properly  
address this on the 7<sup>th</sup> day of  
June, 2006.

RespectFully Submitted,  
Richard W. Wright, Sr.

Richard Wayne Wright, Sr. #187140  
Ventress Correctional Facility  
Segregation Unit/Cell #801  
Post Office Box 767  
Clayton, Alabama 36016